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May 16, 2023

VIA ECF

Hon. Mary Kay Vyskocil
United States District Court Judge
United States Courthouse
Courtroom 18CA
500 Pearl St.
New York, NY 10007

Re: Shahidi v. Robinette., et al.
Case No.: 1:22-cv-6075
Joint Status Update and Request for Adjournment

Dear Judge Vyskocil:

I represent Plaintiff, Ms. Leila Shahidi (“Plaintiff”), in the above-referenced action. First, I would like to apologize for the failure to provide a status update as required by the Court. In accordance with the Court’s Second Order to Show Cause, the parties who have appeared in this action, Plaintiff, Todd Kulkin, Law Offices of Todd Kulkin, P.C., and Sue Robinette (collectively, the “Appearing Parties”), jointly advise the Court of the following:

After extensive pre-filing settlement discussions, the parties (including the non-appearing Defendant Nick Karnik) recommenced settlement discussions in late March 2023 and have been attempting to resolve issues surrounding the logistics of making payment to Plaintiff. The Appearing Parties had hoped that the matter would settle before May 11, 2023, and the status update slipped through the cracks. Unfortunately, the parties were unable to settle, and the Appearing Parties apologize for not promptly informing the Court. Settlement discussions are continuing, and the proposed settlement payment has now been promised by no later than May 31, 2023.

In light of the foregoing, on behalf of the Appearing Parties, all of whom join in this request, Plaintiff respectfully requests that the status conference set for May 18, 2023, be adjourned to June 1, 2023. If the case settles by then, Plaintiff and cross-movant Robinette will promptly file notices of dismissal with prejudice. If the case does not settle, Plaintiff will move for a default judgment against Defendant Nick Karnik and will request that discovery deadlines be reset for Defendants Todd Kulkin and Sue Robinette.

I thank your Honor for your courtesies in this matter.

Respectfully Submitted,

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EDEN P. QUAINTON

cc: All Counsel of Record

The request to adjourn is DENIED. The parties shall appear at the scheduled time. This letter is not an adequate response to the Court's Order To Show Cause. Plaintiff's counsel shall inform Plaintiff that she may face sanctions, including dismissal, because of her chosen counsel's conduct.

Date: May 17, 2023
New York, New York

Mary Kay Vyskocil
Mary Kay Vyskocil
United States District Judge